UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF INDIANA

IRISH 4 REPRODUCTIVE HEALTH, et al.,)))
Plaintiffs) Case No. 3:18-cv-491-PPS-JEM
v.) Judge Philip Simon
UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES, et al.,)))
Defendants.)

DEFENDANT UNIVERSITY OF NOTRE DAME'S MOTION TO DISMISS PLAINTIFFS' SECOND AMENDED COMPLAINT

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendant University of Notre Dame hereby moves to dismiss this action. The grounds for this motion are set forth in the accompanying memorandum.

Dated: September 21, 2020 Respectfully submitted,

/s/ Matthew A. Kairis

Matthew A. Kairis (OH 0055502)
JONES DAY
325 John H. McConnell Blvd., Suite 600
Columbus, OH 43215

Tel.: 614-281-3605 Fax: 614-461-4198 makairis@jonesday.com

Attorney for Defendant University of Notre Dame

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served to the Plaintiffs' counsel and to the government defendants using the Court's CM/ECF system on the 21st day of September, 2020.

/s/ Matthew A. Kairis

Matthew A. Kairis (OH 0055502) JONES DAY 325 John H. McConnell Blvd., Suite 600 Columbus, OH 43215

Tel.: 614-281-3605 Fax: 614-461-4198 makairis@jonesday.com

Counsel for Defendant University of Notre Dame